



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

SEP 12 2014

Certified Mail No. 7003 2260 0000 8873 1902

Darryl Lum
Engineering Section Supervisor
Clean Water Branch
State of Hawaii Department of Health
P.O. Box 3378
Honolulu, HI 96801-3378

Re: Draft NPDES Permit for the City and County of Honolulu, Sand Island Wastewater Treatment Plant (NPDES Permit No. HI0020117)

Dear Mr. Lum:

Thank you for the opportunity to review and comment on the draft permit (NPDES Permit No. HI0020117) for the discharge from the Sand Island WWTP to Mamala Bay, which was public-noticed on August 20, 2014. Overall, we strongly support the draft permit, as it appropriately includes secondary treatment requirements, which will establish discharge control expectations of the permittee that are consistent with national requirements for other POTW wastewater dischargers. Additionally, the draft permit includes updated requirements for toxicity, bacteria, and nutrients that are consistent with NPDES permitting regulations and will provide water quality protection for Mamala Bay. We have two concerns that need to be addressed to ensure the permit meets NPDES requirements. Specifically, our concerns focus on the compliance schedule for enterococcus and the regional monitoring activities.

A. Compliance Schedule

It is not clear whether the compliance schedule for the monthly geometric mean effluent limit for enterococcus meets the requirements of 40 CFR 122.47. The fact sheet must demonstrate that the compliance schedule will lead to compliance with the final effluent limit "as soon as possible." In making this determination, DOH needs to consider the specific steps needed to modify or install treatment facilities, operations or other measures and the time those steps would take. For this facility, the fact sheet states that disinfection facilities already exist and that only minor changes, such as expansion or optimization of treatment may be needed. It is not clear that a 10-year schedule is necessary to implement those changes. The fact sheet must clearly demonstrate that the length of the schedule included in the permit is no longer than necessary to comply with the final effluent limit.

B. Regional Monitoring Activities

The public notice permit includes a provision allowing the permittee to develop and implement a regional monitoring program in lieu of performing some of the monitoring required by the permit. It is not clear which monitoring requirements in the permit would be waived if this regional program went into effect or for how long the waiver would be effective. The language also erroneously provides the permittee shall "identify the designated uses and existing uses of the receiving water," where only DOH has the authority to perform such a task. Development of a regional monitoring program is complex and involves multiple parties. We recommend this language be removed and replaced with a reopener provision, which will allow modification of the permit pursuant to 40 CFR 122.62 to incorporate changes to the monitoring requirements once a regional monitoring program plan has been developed.

We appreciate the opportunity to provide input on the draft permit. Please contact me at (415) 972-3464 or Elizabeth Sablad of my staff at (415) 972-3044 if you have any questions regarding our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "David Smith". The signature is fluid and cursive, with the first name "David" written in a more compact, stylized manner and the last name "Smith" written more fully.

David Smith, Manager
NPDES Permits Section (WTR-2-3)